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WC11-200

Before the MUNICATIONS COMMISSION

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	WC Docket No
Section 63.71 Application of	)	
Comcast Phone, LLC	)	

## **SECTION 63.71 APPLICATION**

Comcast Phone, LLC d/b/a CIMCO, a Division of Comcast Business Services ("Comcast Phone") hereby seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214(a), and Section 63.71 of the Federal Communications Commission's ("Commission's") rules, 47 C.F.R. § 63.71, to discontinue its provision of one of its postpaid calling card services called Solution Calling Card Service.

Comcast Phone provides domestic interstate and international telecommunications services in and between points within the contiguous United States, Alaska, Hawaii, Puerto Rico, the U.S. Virgin Islands, Commonwealth of the Northern Mariana Islands, Guam, American Samoa, and to points international.<sup>1</sup> The Solution Calling Card service permits the customer to charge the principal presubscribed location for a call while the customer is away from the principal location, using an identified third-party vendor as the underlying carrier. There are approximately 100 enterprise customers of Comcast Phone's Solution Calling Card service,<sup>2</sup> approximately 40 of which have been active in the past three months.

Notice of the proposed discontinuance is being filed simultaneously with the International Bureau pursuant to Section 63.19 of the Commission's rules. 47 C.F.R. § 63.19.

All customers of the service are enterprise customers, which distribute the cards to selected employees.

The underlying third-party carrier for the Solution Calling Card Service has indicated to Comcast Phone that it would no longer support the calling card service after January 31, 2012. Accordingly, Comcast Phone must discontinue offering and providing the Solution Calling Card Service to its customers effective January 31, 2012. The proposed discontinuance will not result in material harm to the affected customers because these customers will retain all of their other telecommunications services provided by Comcast Phone and can easily obtain alternatives to the Solution Calling Card Service from other service providers.

Comcast Phone provides the following information pursuant to Section 63.71 of the Commission's rules:

- 1. <u>Name and Address of Carrier</u>: Comcast Phone, LLC is located at One Comcast Center, 1701 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103.
- 2. <u>Date of Planned Service Discontinuance, Reduction or Impairment</u>: Comcast Phone plans to discontinue the provision of the Solution Calling Card Service to its affected customers effective January 31, 2012. Comcast Phone understands that this application will be automatically granted on the 31<sup>st</sup> day after public notice of its filing unless the Commission notifies it to the contrary.<sup>3</sup>
- 3. <u>Points of Geographic Areas of Service Affected</u>: Comcast Phone's proposed discontinuance of the Solution Calling Card Service will affect customers located in Georgia, Illinois, Indiana, Louisiana, Michigan, Texas, and Wisconsin.<sup>4</sup>
- 4. <u>Brief Description of Type of Service Affected</u>: The Solution Calling Card Service is a postpaid calling card service that permits the customer to charge the principal

<sup>&</sup>lt;sup>3</sup> 47 C.F.R. § 63.71(c).

In the past year, the Solution Calling Card Service has been used by customers in only three of the states listed: Illinois, Michigan, and Wisconsin.

presubscribed location for a call while the customer is away from the principal location, using a particular identified third-party vendor as the underlying carrier.

- 5. <u>Brief Description of the Dates and Methods of Notice to All Affected Customers:</u>
  Comcast Phone notified affected customers of the planned discontinuance of the Solution Calling
  Card Service by letter sent via the U.S. Postal Service on November 21, 2011. A copy of the
  notification letter sent to affected customers is appended hereto as Attachment A.
- 6. <u>Regulatory Classification of Carrier</u>: Comcast Phone is considered non-dominant with respect to the service to be discontinued.

Concurrent with the filing of this Application, copies of this Application are being sent via the U.S. Postal Service to the public utility commissions and the Governors of Georgia, Illinois, Indiana, Louisiana, Michigan, Texas, and Wisconsin, and the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

Please direct questions regarding this Application to:

Charles W. Logan Lawler, Metzger, Keeney & Logan, LLC 2001 K Street, N.W., Suite 802 Washington, DC 20006 (202) 777-7700 blogan@lawlermetzger.com The public convenience and necessity will not be adversely affected by the discontinuance of Comcast Phone's Solution Calling Card Service. The affected customers are limited to a small number of enterprise customers and all have been given notice affording them ample time to acquire substitute services which are readily available. Comcast Phone, therefore, respectfully requests Commission approval of this Section 63.71 Application.

Respectfully submitted,

**COMCAST PHONE, LLC** 

By:

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Counsel to Comcast Phone, LLC

Dated: November 21, 2011

## ATTACHMENT A

**Customer Notification Letter** 



November 21, 2011

## Customer Notice Regarding Discontinuance of Solution Calling Card Service

On January 31, 2012, CIMCO, a Division of Comcast Business Services, will stop providing its Solution Calling Card Service (which to date has been provided to customers in Georgia, Illinois, Indiana, Louisiana, Michigan, Texas, and Wisconsin) because it has received notice that its underlying vendor is discontinuing support for the service. The Solution Calling Card Service is a postpaid calling card service that permits the customer to charge the principal presubscribed location for a call while the customer is away from the principal location.

The discontinuation of the Solution Calling Card Service applies only to that particular calling card service and does NOT affect any other products or services that you purchase from us.

If you have any questions regarding this matter, please contact us at 1-877-691-8080 at any time. We thank you for your business and look forward to continuing to fulfill your communications needs with our many other communications services and packages.

Sincerely,

COMCAST PHONE, LLC d/b/a CIMCO, a Division of Comcast Business Services
COMCAST PHONE OF GEORGIA, LLC, d/b/a CIMCO, a Division of Comcast Business Services
COMCAST PHONE OF ILLINOIS, LLC d/b/a Comcast Digital Phone, and d/b/a CIMCO, a
Division of Comcast Business Services
One Comcast Center

One Comcast Center 1701 John F. Kennedy Boulevard Philadelphia, PA 19103

The Federal Communications Commission requires us to include the following statement in this Customer Notice:

The Federal Communications Commission ("FCC") will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Comcast Phone, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

## **CERTIFICATE OF SERVICE**

I, Ruth Holder, hereby certify that a copy of the foregoing Section 63.71 Application of Comcast Phone, LLC was served on this 21st day of November, 2011, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below:

Secretary of Defense Attn: Special Asst. for Telecommunications Pentagon Washington, DC 20301

Georgia Public Service Commission 244 Washington Street, SW Atlanta, GA 30334-9052

Office of Governor Nathan Deal State of Georgia 203 State Capitol Atlanta, GA 30334

Illinois Commerce Commission 527 East Capitol Avenue Springfield, IL 62701

Office of Governor Pat Quinn 207 State House Springfield, IL 62706

Indiana Utility Regulatory Commission PNC Center 101 West Washington Street, Suite 1500 E Indianapolis, IN 46204

Office of Governor Mitch Daniels Statehouse Indianapolis, IN 46204-2797

Louisiana Public Service Commission Galvez Building, 12<sup>th</sup> Floor 602 North Fifth Street P.O. Box 91154 Baton Rouge, LA 70821-9154 Office of Governor Bobby Jindal P.O. Box 94004 Baton Rouge, LA 70804-9004

Michigan Public Service Commission P.O. Box 30221 Lansing, MI 48909

Office of Governor Rick Snyder P.O. Box 30013 Lansing, MI 48909

Public Utility Commission of Texas 1701 N. Congress Ave. P.O. Box 13326 Austin, TX 78711-3326

Office of Governor Rick Perry P.O. Box 12428 Austin, TX 78711-2428

Public Service Commission of Wisconsin 610 North Whitney Way, P.O. Box 7854 Madison, WI 53707-7854

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Office of Governor Scott Walker 115 East Capitol Madison, WI 53702

Ruth Holder